

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

ETRIC PRUITT, LARRY FRIDAY,
ALAN BUSH, NATE WONSLEY,
JESSE ANDERSON, and TYRONE
KEYS v. National Football League, et al;
USDC, So. Dist. of MS, Jackson Div., No.
3:13cv00571

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

MOTION FOR ADDITIONAL TIME TO
SERVE

MOTION FOR ADDITIONAL TIME TO SERVE DEFENDANT

Plaintiffs file this, their Motion for Additional Time to Serve Defendant, Riddell, Inc., individually and d/b/a Riddell Sports Group, Inc., and in support thereof, would show unto the Court the following:

1. Plaintiffs filed their cause of action against Defendants on or about June 10, 2013. Plaintiffs filed their Amended Complaint on or about July 29, 2013, and their Second Amended Complaint on or about September 12, 2013. The Plaintiffs have served all Defendants with the exception of Riddell, Inc., individually and d/b/a Riddell Sports Group, Inc.

2. Plaintiffs have exercised due diligence in attempting to serve Defendant, Riddell, Inc., individually and d/b/a Riddell Sports Group, Inc., but have not been successful. Plaintiffs attempted to serve Riddell, Inc. at the address of 3670 North Milwaukee Avenue, Chicago, Illinois 60641 by certified mail, but the certified mail was returned for insufficient address.

Plaintiffs have attempted service by certified mail at the address of 9801 W. Higgins Road # 800, Rosemont, IL 60018; but service has not yet been completed. but service has not yet been completed. Affidavit of Wayne E. Ferrell, Jr. attached hereto as Exhibit "A" and incorporated herein by reference.

3. Plaintiffs' 120-day time limit for service of process has not expired at this time. Plaintiffs' deadline to serve process on all Defendants is presently October 9, 2013.

4. Therefore, Plaintiffs request that the Court grant them an additional ninety (90) days for this good cause shown beyond the present deadline in which to serve Defendant, Riddell, Inc.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that this Court find that good cause exists for granting Plaintiffs an additional ninety (90) days beyond the present deadline in which to serve the Defendant, Riddell, Inc.

RESPECTFULLY SUBMITTED:

/s/ Wayne E. Ferrell, Jr.

Pending Pro Hac Vice Admission

Wayne E. Ferrell, Jr., Esquire

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, WAYNE E. FERRELL, JR., do hereby certify that I have this day electronically filed the foregoing document with the Clerk of the Court utilizing the ECF system which sent notification of such filing to the following:

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This the 8th day of October, 2013.

/s/ Wayne E. Ferrell, Jr. _____

Wayne E. Ferrell, Jr., Esquire